REMARKS

Claims 1-7, 19-25, and 28-34 are pending in the present application and all stand rejected. By this Amendment, claims 1, 19 and 28 have been amended. Support for the amendment to claim 1 may be found, for example, in FIGs. 3 and 4 and on page 9, ll. 4-15. The Applicants request reconsideration of the rejections based on the following remarks.

Claims 19-25 and 28-34 were rejected under 35 U.S.C. §112, second paragraph. In particular, the Office Action alleges that with respect to claims 19 and 28, it is unclear how the common bus terminal is removed and reinserted onto the discrete circuits. The Applicants respectfully traverse this rejection and request reconsideration for the following reasons.

With respect to claims 19 and 28, this rejection is believed to be moot in light of the amendments to these claims. Nonetheless, the concept of the previous claimed elements rejected is still claimed and is believed to be clear. That is, FIGs. 3-5 and pg. 9, lines 4-15 of the present application, as examples, disclose that a common bus terminal (e.g., 46) is separable from the discrete circuits 56, such as when the cover is removed and the common bus terminal separates from the rest of the fuse box including the discrete circuits. Thus, support is given in the specification for these claimed features.

Claims 1, 3, 5, and 6 were rejected under 35 U.S.C. §102(b) as being anticipated by *Lee* (U.S. Patent No. 3,905,013). The Applicant respectfully disagree.

With respect to claim 1, this claim features "[a] common bus assembly configured to be removable and reinsertable to contact the fuses in the rows to thereby connect electrically to [a] plurality of discrete circuits." In contrast, FIGs. 3 and 4 of *Lee*, illustrate a fuse block b_F having a fixed common bus B_F that is not removable or reinsertable. Accordingly, the Applicants respectfully submit that *Lee* does not teach or suggest this element of claim 1.

Additionally, the present Office Action asserted, in response to Applicants' previous arguments, that *Lee* "shows a single column comprising a plurality of row, wherein each row comprises one fuse." Although the Patent Office may broadly interpret claim language, that interpretation must nonetheless be reasonable and consistent with the interpretation that those skilled in the art would reach. (See, e.g., MPEP §2111). The Applicants respectfully submit that the broad interpretation of the fuse block of *Lee* being equivalent to claimed "plurality of rows of fuses" is not reasonable and is further not consistent with an interpretation that one of ordinary

skill in the art would reach. The fuse block disclosed by *Lee* is a simple monolithic structure with ostensibly one row (or column) of fuses. One of ordinary skill in the art would not look at this teaching and call this a column of fuses with multiple rows of one fuse. Also, such interpretation makes a presumption beyond the teachings of the present application that the claimed rows of fuses would necessarily be arranged in some sort of matrix formation where distinguishable columns would be present. Such presumption also evinces that that the interpretation is not correct or reasonable.

Additionally, the Office Action alleges that prior art teachings in the present application are important to the determination of patentability. The Applicants respectfully submit that this is incorrect and also inconsistent with the position taken in the actual 102(b) rejection. That is, the Office Action asserts that prior art discussed in the present application showing rows of fuses is well known and it would be obvious to modify *Lee*, accordingly. However, the actual rejection made was a 102 rejection, not a 103 rejection, so this argument is simply not applicable. Moreover, it would not be obvious to modify *Lee* to arrive at the claimed features of claim 1 because one of ordinary skill in the art would not be motivated to add rows of fuses to a monolithic fuse block, since doing so would make connection to the common terminal c_F much more complicated and impractical.

In light of the above, the Applicants respectfully submit that *Lee* does not teach or suggest all of the elements of claim 1 and the rejection of this claim should be withdrawn, accordingly.

Additionally, claims 2-7, which depend from claim 1, are believed to be allowable on their merits as well as their dependency on claim 1. Thus, the 103 rejections of claims 2 (*Lee* in view of *Lyman*), 4 (*Lee* in view of *Mobley*), and 7 (*Lee* in view of *Kondo et al.*)

Claims 2, 19-23, 25, 28, 33, and 34 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Lee* in view of *Lyman* (U.S. Patent No. 2,496,732). The Applicants respectfully request reconsideration of this rejection for the following reasons.

With respect to claim 2, this claim is believed to be allowable for reasons presented previously.

With respect to independent claims 19 and 28, the Office Action has asserted that *Lee* discloses the elements of these claims except for the common bus terminal being translationally removable and reinsertable onto a plurality of fuses. The Office Action attempts to remedy this deficiency via *Lyman*.

Notwithstanding these assertions, neither of the cited references teach or suggest the claimed arrangement with fuses "arranged between the base and cover of the fuse box

Fig. 6 of *Lyman* is the only figure that discloses fuses, namely, fuses 45. Specifically, Fig. 6 shows an apparatus with panels C and D. The fuses 45 are connected to the base panel D. Cables 40 and 41 are attached to and are removable with the panel C. In that manner, cables 40 and 41 lift away from panel D with the panel C. Fig. 6 does not show a common bus removable with the cover that also affords separation from the discrete circuits.

Moreover, *Lyman* provides no instructions or suggestions as to how its Fig. 6 apparatus could be modified to provide or teach the apparatuses of Claims 19 and 28. In Fig. 6, rather, cables 40 and 41 are required to be removable with the cover so that spring contacts "U" connected electrically to cables 40 and 41 can contact electrically legs 24, which in turn are connected electrically to respective fuses 45. One would have to severely modify *Lee* and/or *Lyman* to create the apparatus of claims 19 and 28, which would: (i) be a hindsight reconstruction of those claims; and (ii) require significant structural limitations to be deemed "inherently known" since no art has been presented to show the combination of structural elements of claims 19 and 28.

In response to the above argument, which was presented in Applicants' last response, the present Office Action has dismissed this by asserting that the test for combining references is what the combined teaching of the references would have suggested to one of ordinary skill in the art. Although this is a correct statement of the law, this test nonetheless was not met by the present rejection. That is, one of ordinary skill in the art would not have received a suggestion to combine these teachings. The stated motivation in the Office Action (i.e., "for the purpose of breaking or disconnecting the contacts between the voltage supply terminal and the discrete circuits") is specious. This "purpose" can be simply be accomplished in the system of *Lee* by removing the fuses from the clips in this open fuse block, which requires access to connect an adapter 11 to the bus B_F. Thus, to add the features of Lyman would only frustrate the ability to

perform this function and would render Lee unsatisfactory for its intended purpose in the context of the teachings of Lee. (See also MPEP §2143.01) Accordingly, the Applicants respectfully submit that combined teachings of these references would not have provided suggestion to one of ordinary skill in the art to actually combine these teachings.

In view of the foregoing, Applicants respectfully submit that the elements of claims 19 and 28 are not taught or suggested by *Lee* and *Lyman,* either combined or alone. Additionally, claims 20-25 and 29-34, which depend respectively therefrom, are also distinguished over *Lee* and *Lyman* on their merits, as well as due to their dependencies. Thus, the other 103 rejections in the present Office Action rejecting some of these dependent claims (i.e., claims 24, 29, and 30-32) are also believed to be overcome.

The Applicants also note that the rejection of claims 24, 29, and 30-32 have not clearly established a *prima facie* case of obviousness because the rejections of the independent claims that they depend from (i.e., either claim 19 or claim 28) required the use of *Lyman*, whereas the rejections of these dependent claims do not appear to rely on the teachings of *Lyman.* Thus, these rejections are not clear on the Patent Office's position concerning how claimed elements admitted to be missing from *Lee* that were allegedly taught by *Lyman* are met by these combination of references omitting *Lyman* to reject these claims.

In light of the foregoing comments, the Applicants respectfully submit that the pending claims are in condition for allowance and request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

BELL, BOYD & LLOYD LLC

BY _____

Patrick B. Law
Reg. No. 41,549
P.O. Box 1135
Chicago, Illinois 60690-1135
Phone: (312) 807-4270

Dated: March 10, 2004